

EXHIBIT A
TO PLAINTIFF'S RESPONSE TO DEFENDANT'S OBJECTIONS

Haines/PRM Invoice**Time:**

| DATE | DESCRIPTION | HOURS |
|---------|--|-------|
| 4.24.12 | Legal research regarding complaint, begin drafting complaint, conference with [client]. | 2.0 |
| 4.26.12 | Legal Research regarding FOIA complaints, Conference with [client]. | 1.0 |
| 4.27.12 | Legal Research regarding FOIA exemptions and litigation process (state law library), review samples. | 3.0 |
| 5.2.12 | Cite Check complaint (state law library) | 2.0 |
| 5.3.12 | Legal Research regarding remedies upon exhaustion of remedies, correspond with [client] | 3.0 |
| 5.4.12 | Legal Research, Exhaustion of Admin Remedies, Correspond with [client] | 1.0 |
| 5.7.12 | Revise Complaint, review sample complaints | 2.0 |
| 5.11.12 | Legal Research regarding FOIA exemptions 1, 3, 5 | 3.0 |
| 5.17.12 | Review consultation with [outside counsel]. Call USDC clerk of court. Prepare Summons, Complaint, cover Sheet for filing, Review filing requirements. | 3.0 |
| 5.18.12 | Legal research regarding litigating exemptions 1, 3, 5 | 2.5 |
| 5.19.12 | Legal research regarding litigating exemptions 1, 3, 5 | 2.0 |
| 5.21.12 | Consultation with [outside counsel], review filings | 2.0 |
| 5.22.12 | Finalize Summons, Complaint, etc. Consult with [outside counsel], Conference with [client]. File complaint. File certificate of service. | 4.0 |
| 7.2.12 | Review Answer, research pretrial conference and 26f conference requirements | 2.0 |
| 7.13.12 | Conference with [client] regarding answer and settlement, Correspond with [counsel for defendant] re: settlement conference | .5 |
| 7.26.12 | Conference with [counsel for defendant] to discuss 26f report and options for resolution; Research defendant's position of case; correspond with client regarding same | 2.0 |

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| 7.27.12 | Research litigation considerations and local rules regarding discovery in FOIA cases | 1.0 |
| 8.3.12 | Review Draft 26f report. Correspond with [counsel for defendant] regarding Plaintiff's case, draft 26f revisions | 2.5 |
| 8.4.12 | Research discovery considerations, local rules and Fed Rules regarding 26f report and conference. Correspond with [client] regarding 26f report. | 2.0 |
| 8.5.12 | Draft Plaintiff's case narrative. Correspond with [counsel for defendant] and [client] regarding 26f meeting. | 3.0 |
| 8.6.12 | Prepare for and attend 26f meeting. Draft 26f report. Correspond with [counsel for defendant] and [client]. Review letter delivered by [counsel for defendant]. | 3.0 |
| 8.7.12 | Finalize 26f report. | 1.0 |
| 8.9.12 | Draft settlement letter to Magistrate | 2.0 |
| 8.13.12 | Correspond with [counsel for defendant] regarding case and defendant representation. Legal research regarding same and discovery. Prepare for scheduling conference. | 1.5 |
| 8.14.12 | Attend scheduling conference with Magistrate and [counsel for defendant]. Conference with [client]. | 2.0 |
| 8.28.12 | Conference with [client] regarding go-forward | .5 |
| 9.6.12/9.7.12 | Consult with [outside counsel] regarding case | .5 |
| 9.17.12 | Correspond with [counsel for defendant] regarding DOJ's request for stipulation | .5 |
| 9.18.12 | Consult with [outside counsel] regarding case | .75 |
| 9.25.12 | Review government's SJ brief. Review [client] notes regarding same. Draft memo to [client]. Consult with [outside counsel]. | 2.0 |
| 10.4.12 | Prepare SJ response memo, research fees memo | 2.0 |
| 10.5.12 | Prepare SJ response memo, prepare fees argument | 5.0 |
| 10.14.12 | Conference with [client] regarding stipulation | 0.5 |
| 10.15.12 | Prepare stipulation agreement, correspond with [counsel for defendant]. | 3.0 |

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| 10.16.12 | Law library, legal research fees motion | 3.0 |
| 10.17.12 | Legal research regarding dismissal and fees, begin drafting fees motion | 3.0 |
| 10.18.12 | Draft Joint stipulation and proposed order, correspond with [counsel for defendant] and [client] regarding same, file same | 3.0 |
| 10.18.12 | Fees motion research, writing | 3.0 |
| 10.19.12 | Fees motion research, writing | 3.0 |
| 10.22.12 | Fees motion research, writing | 5.0 |
| 10.23.12 | Fees motion research, writing | 2.0 |
| 10.28.12 | Finalize motion papers, review local and federal motion practice rules, correspond with chambers regarding procedural requirements of motion given the 10.26.12 Order, review Order, correspond with client regarding final documents | 5.0 |
| 10.30.12 | File Motion | 1.0 |
| Total at motion | | 95.75 |
| 12.3.12 | Review Response Motion, Research and prepare to draft reply | 3.0 |
| 12.11.12 | Draft reply | 7.0 |
| 12.12.12 | Draft reply | 6.0 |
| 12.14.12 | Finalize and file reply | 2.0 |
| 1.29.13 | Review Order Granting Fees | [0] |
| 2.14.13 | Review Objections to Order, research 28USC626 and LR 72 and 7.1 | 2.0 |
| 2.14.13 | Draft response to Objections | 1.0 |
| 2.19.13 | Draft response to Objections, conference with [client] | 1.0 |
| 2.20.13 | Draft response to Objections | 2.0 |
| 2.22.13 | Draft response to Objections, conference with [client] | 7.0 |
| 2.23.13 | Prepare documentation filing, Review Magistrate's Order and LR regarding filing requirements | 1.0 |
| 2.25.13 | Draft and finalize response to Objections, file. | 5.0 |
| Total (\$150/hr) | | 95.75 + 37 = 132.75 hours |

Costs

| DATE | DESCRIPTION | AMOUNT |
|---------|----------------------------|---------------------------|
| 5.22.12 | USDC Filing Fee | \$350 (submitted) |
| Various | Mileage, Parking, Printing | (\$148.15, Not submitted) |
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